

**EXHIBIT 31**  
**FILED UNDER SEAL**

Page 1

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

- - -

STATE OF TEXAS et al., : CASE NO.  
: 4:20-CV-00957-  
Plaintiffs, : SDJ  
:  
v. :  
:  
GOGGLE, LLC, :  
:  
Defendants. :  
:

- HIGHLY CONFIDENTIAL -  
PURSUANT TO PROTECTIVE ORDER

- - -

May 1, 2024

- - -

Videotaped deposition of [REDACTED]  
taken pursuant to notice, was held at the law  
offices of Axinn, Veltrop & Harkrider LLP, 114 West  
47th Street, New York, New York, beginning at  
9:08 a.m., on the above date, before Michelle L.  
Gray, a Registered Professional Reporter, Certified  
Shorthand Reporter, Certified Realtime Reporter,  
Certified Court Reporter and Notary Public.

- - -

Job No. MDLG6673130

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Page 4

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6 Jonathan Juarez - in person

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9 Vince Rosica - Zoom

10 (Golkow/Precision Trial Solutions)

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12 ALSO PRESENT:

13 Alexander Bergersen - in person

14 (Inhouse Google)

Jonathan Jaffe - Zoom

15 (Consultant)

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17 - - -

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I N D E X  
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Testimony of: [REDACTED]

By Mr. Hansum

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E X H I B I T S  
- - -

NO.	DESCRIPTION	PAGE
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Exhibit 330	Graphic Sell-Side Buy-Side Demand	58
Exhibit 331	[REDACTED] GOOG-DOJ-1474052-54	82
Exhibit 332	Copy of Auction First Edit in Progress 10/19/13 GOOG-AT-MDL- 002468282-99	133

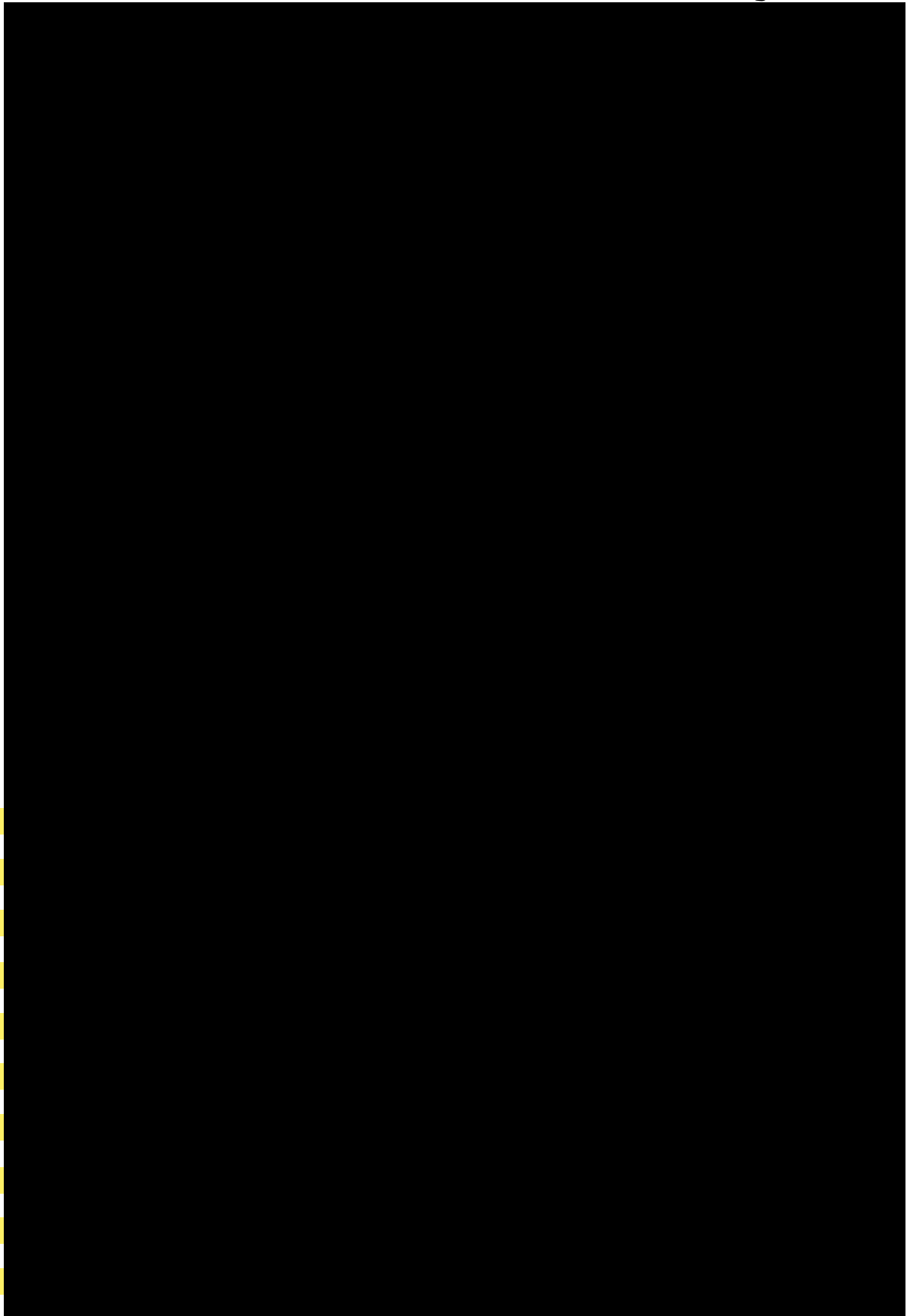
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2		E X H I B I T S (Cont'd.)	
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5	Exhibit 333	E-mail Thread 11/19/14 [REDACTED] [REDACTED] [REDACTED] GOOG-DOJ-32321240-42	205
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7	Exhibit 334	[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] GOOG-DOJ-15769196-7	219
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9	Exhibit 335	E-mail Thread 3/20/18 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] GOOG-DOJ-14744814-16	226
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12	Exhibit 336	E-mail Thread 1/11/17 [REDACTED] [REDACTED] [REDACTED] [REDACTED] GOOG-DOJ-14158749-50	251
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19	Exhibit 338	[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] GOOG-AT-MDL- 004284828-30	286
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Exhibit 342	E-mail Thread 9/19/16 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] GOOG-DOJ-14156098-100	328

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MR. PEARL: Objection. Form.

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CERTIFICATE

I HEREBY CERTIFY that the witness was duly sworn by me and that the deposition is a true record of the testimony given by the witness.

It was requested before completion of the deposition that the witness, [REDACTED] have the opportunity to read and sign the deposition transcript.



MICHELLE L. GRAY,  
A Registered Professional  
Reporter, Certified Shorthand  
Reporter, Certified Realtime  
Reporter, Certified Court Reporter  
and Notary Public  
Dated: May 2, 2024

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